

April 20, 2012

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554



RE: Notice of Oral *Ex Parte* Communication  
Docket 00-168  
Docket 00-44

Dear Ms. Dortch:

This notice is submitted in fulfillment of Section 1.1206(b) of the Commission's Rules.

On April 20, 2012, I had a brief telephone conversation with Dave Grimaldi, Chief of Staff for Commissioner Clyburn, with respect to the above-shown dockets.

In the conversation, I addressed concerns that the Commission's proposed scheme for online publication of television stations' political files would adversely impact small stations. I noted that, while I am skeptical that the proposal will cause significant burdens for any station, there is no opposition on the part of public interest groups to a phase-in that gives smaller stations an extended period of time to prepare for the implementation of online publication. I said that aggregated information is of far less value to journalists and the public because it makes it far harder to conduct effective analyses of the impact of campaign expenditures on the political process. I also stated that there is no reason to believe that advertisers will target small broadcasters differently than large ones. It is particularly significant, I said, that the information has always been publicly available and, if there were a meaningful strategic benefit to advertisers from access to this information, they would have been seeking access to it for many years. To the extent that there might be actually be greater use of this information if it were published online, I said that this is fairly described as being part of the obligations that broadcasters accept in exchange for the benefit of receiving free access to valuable public spectrum.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Andrew Jay Schwarzman".

Andrew Jay Schwarzman

cc. Dave Grimaldi